

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

FILED

AUG 18 2015


CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIMOTHY J. FIELDING,

Defendant.

CR 14-50064

SUPERSEDING INDICTMENT

Attempted Commercial Sex
Trafficking
(18 U.S.C. §§ 1591(a)(1), 1591(b)(2),
1594(a) and 1594(d)(1))

Attempted Enticement of a Minor
Using the Internet
(18 U.S.C. § 2422(b))

The Grand Jury charges:

COUNT I

On or about between August 1, 2014, and August 7, 2014, in the District of South Dakota and elsewhere, in and affecting interstate commerce, the defendant, Timothy J. Fielding, did knowingly attempt to recruit, entice, and obtain a person who had attained the age of 14 years but not attained the age of 16 years, knowing and in reckless disregard that the person was a minor and would be caused to engage in a commercial sex act, all in violation of 18 U.S.C. §§ 1591(a)(1), 1591(b)(2), and 1594(a).

COUNT II

On or about between August 3, 2014, and August 6, 2014, in the District of South Dakota, the defendant, Timothy J. Fielding, did use a facility and means of interstate commerce, that is, a cellular phone and computer attached

to the Internet, to attempt to knowingly persuade, induce, entice, and coerce an individual who had not yet attained 18 years of age to engage in sexual activity for which the defendant could be charged with a criminal offense, namely, rape in the fourth degree, in violation of South Dakota Codified Law §§ 22-22-1(5), all in violation of 18 U.S.C. § 2422(b).

FORFEITURE ALLEGATION

1. The allegations contained in this indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 1594(d)(1).

2. If convicted of the offense set forth above, the defendant, Timothy J. Fielding, shall forfeit to the United States any and all materials or property used or intended to be used to commit or to facilitate commercial sex trafficking. Such property includes, but is not limited to United States currency.

A TRUE BILL:

NAME REDACTED

Foreperson

RANDOLPH J. SEILER
ACTING UNITED STATES ATTORNEY

By: 